

REMARKS/ARGUMENTS

This Amendment is being filed in response to the Office Action dated November 28, 2007. Reconsideration and allowance of the application in view of the amendments made above and the remarks to follow are respectfully requested.

Claims 1-20 are pending in the Application. Claims 1, 15 and 20 are independent claims.

In the Office Action, claims 6 and 9 are objected to for informalities. In response, claims 6 and 9 are amended to remove the informalities noted by the Examiner. Accordingly, it is respectfully submitted that claims 6 and 9 are in proper form and withdrawal of the objections is respectfully requested. Further, claim 1 is amended for non-statutory reasons, such as for better form including deleting reference numerals typically used in European practice that are known to not limit the scope of the claims. It is respectfully submitted that claim 1 is not amended to address issues of patentability and Applicants respectfully reserve all rights under the Doctrine of Equivalents.

Claims 1-14 are rejected under 35 U.S.C. §112, second paragraph as allegedly being indefinite due to the phrase "the potion with an identification information" allegedly being unclear.

This position is respectfully refuted. However, in the interest of expediting consideration and allowance of the claims, claim 1 is amended herein in accordance with the suggestion provided by the Examiner. Accordingly, it is respectfully submitted that claims 1-14 are in proper form and it is respectfully requested that these rejections be withdrawn.

Claims 1-3, 7 and 11-15 are rejected under 35 U.S.C. §102(b) as allegedly anticipated by U.S. Patent Publication No. 2003/0061504 to Sprigg ("Sprigg"). Claims 4 and 6 are rejected under 35 U.S.C. §103(a) as allegedly unpatentable over Sprigg in view of U.S. Patent No. 6,904,232 to Ayat ("Ayat") and U.S. Patent No. 6,414,920 to Lee ("Lee"). Claims 9 and 10 are rejected under 35 U.S.C. §103(a) as allegedly unpatentable over Sprigg in view of U.S. Patent No. 6,292,874 to Barnett ("Barnett").

These rejections are respectfully traversed. It is respectfully submitted that claims 1-20 are allowable over Sprigg alone and in view of any combination of Ayat, Lee and Barnett for at least the following reasons.

Sprigg shows a system for granting an application that is stored in a storage area 110, access to the storage area. As stated in Sprigg (emphasis added), [t]he storage area 110 of the

computer device 105 is used to store data and applications received into the computer device 105." (See, FIG. 1 and accompanying text in paragraph [0026].) Accordingly, it is respectfully submitted that Sprigg teaches allocating a portion of a common storage area to an application and data related to the application.

The Office Action cites several paragraphs of Sprigg for showing the elements of claim 1, however, it is respectfully submitted that reliance in Sprigg is misplaced. For example paragraph [0013] cited in the Office Action makes clear that (emphasis added) "the present invention [of Sprigg] provides a method for storing an application on a device, comprising the steps of receiving the application at the device, storing the application in a storage on the device, and limiting access of the application to a unique portion on the storage ..." Similarly, cited paragraph [0034] makes clear that a "network may be used to send an application to a computer device, such as the wireless device 230. The application ... has a digital signature ... [that] may be bound to the application and stored on the wireless device either bound [together with the application] or separate ..." As further made clear in Sprigg, "the root of the file structure defines the files to be stored in this portion of the storage area. Subdirectories to

the File root directory 300 include Applications 305 and Shared 310. As the computer device receives applications, they are stored in subdirectories (e.g., App X 315 and App Y 320) under the Applications directory 305." (See, Sprigg, paragraph [0036].)

It is respectfully submitted that the device of claim 1 is not anticipated or made obvious by the teachings of Sprigg alone and in view of any combination of Ayat, Lee and Barnett. For example, Sprigg alone and in view of any combination of Ayat, Lee and Barnett does not disclose or suggest, a device that amongst other patentable elements, comprises (illustrative emphasis provided) "a storage management unit for allocating a portion of the local storage arrangement to the removable storage carrier and referencing the portion with identification information respecting respective access rights to a data item stored in the portion granted to the software application stored on the removable data carrier" as recited in claim 1 and as similarly recited in claim 15. As pointed out above, Sprigg allocates a portion of a common storage device to both an application and data related to the application. In addition, it is respectfully submitted that the device of claim 20 is not anticipated or made obvious by the teachings of Sprigg alone and in view of any combination of Ayat,

Lee and Barnett. For example, Sprigg alone and in view of any combination of Ayat, Lee and Barnett does not disclose or suggest, a device that amongst other patentable elements, comprises (illustrative emphasis provided) "a storage management unit for allocating a portion of the local storage arrangement to the removable storage carrier and referencing the portion with the identifier respecting respective access rights to a data item stored in the portion granted to the removable storage carrier" as recited in claim 20. Each of Ayat, Lee and Barnett are introduced for allegedly showing elements of the dependent claims and as such, do nothing to cure the deficiencies in Sprigg.

Based on the foregoing, the Applicants respectfully submit that independent claims 1, 15 and 20 are patentable over Sprigg alone and in view of any combination of Ayat, Lee and Barnett and notice to this effect is earnestly solicited. Claims 2-14 and 16-19 depend from claim 1 and accordingly are allowable for at least this reason as well as for the separately patentable elements contained in each of the claims. For example, it is respectfully submitted that Sprigg alone and in view of any combination of Ayat, Lee and Barnett does not disclose or suggest "wherein the storage management unit allocates an equal size portion to any removable

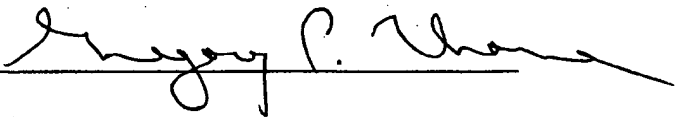
storage carrier" as recited in claim 16; nor "wherein the storage management unit allocates a size of the portion based on requirements of the application" as recited in claim 17; nor "wherein the storage management unit adapts a size of the portion over time" as recited in claim 18; nor "wherein the storage management unit enlarges the size of the portion by reducing a size of another portion of the local storage arrangement allocated to another removable storage carrier" recited in claim 19.

Accordingly, separate consideration of each of the dependent claims is respectfully requested.

In addition, Applicants deny any statement, position or averment of the Examiner that is not specifically addressed by the foregoing argument and response. Any rejections and/or points of argument not addressed would appear to be moot in view of the presented remarks. However, the Applicants reserve the right to submit further arguments in support of the above stated position, should that become necessary. No arguments are waived and none of the Examiner's statements are conceded.

Applicants have made a diligent and sincere effort to place this application in condition for immediate allowance and notice to this effect is earnestly solicited.

Respectfully submitted,

By 

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